



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 19, 2022

**BY ECF**

Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. George Constantine et al.*, S1 21 Cr. 530 (SHS)**

Dear Judge Stein:

The Government respectfully submits this letter on behalf of the parties to inform the Court that the parties have jointly agreed to the following pretrial disclosure deadlines in advance of the November 28, 2022 trial date, which they request that the Court adopt:

**1. Five weeks before trial – October 24:**

- Government provides, consistent with the requirements of Federal Rule of Criminal Procedure 16, notice of experts potentially to be called, if any, during the Government's case-in-chief.

**2. Four weeks before trial – October 31:**

- The Government provides notice to the defendants of evidence it may seek to offer pursuant to Federal Rule of Evidence 404(b).

**3. Three weeks before trial – November 7:**

- The Government provides to the defendants a list of exhibits the Government reasonably expects to seek to introduce during its case-in-chief. This exhibit list will be subject to good-faith revision as the Government continues to prepare its case for trial, including in response to the defense's list of proposed exhibits that it anticipates seeking to introduce into evidence during the Government's case-in-chief.
- The Government provides to the defendants a list of witnesses whom the Government reasonably expects to call in its case-in-chief.

- Defense counsel provides, consistent with the requirements of Federal Rule of Criminal Procedure 16, notice of experts potentially to be called, if any, during the defendants' case.

#### 4. Two weeks before trial – November 14:

- Defense counsel provides to the Government material covered by Federal Rule of Criminal Procedure 16 and a list of exhibits that the defendants reasonably expect to introduce during the Government's case-in-chief or the defendant's case, with the exception of impeachment material. This exhibit list will be subject to good-faith revision as the defense continues to prepare for its case and the defense has an ongoing obligation to produce Rule 16 material on a rolling basis.
- Government will provide all 3500 material to the extent that it has not been previously produced and continue to produce 3500 on a rolling basis.
- Defense counsel provides to the Government material covered by Federal Rule of Criminal Procedure 26.2.
- The parties provide notice to each other, consistent with the requirements of Rule 16, of rebuttal expert testimony, if any.

## 5. One week before trial – November 21:

- Defense provides the list of witnesses whom the defendants reasonably expect to call in their case. This witness list will be subject to good-faith revision as the defense continues to prepare for its case.

Respectfully submitted,

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